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**ALLEGHENY COUNTY HEALTH DEPT.
AIR QUALITY PROGRAM**

November 22, 2006

Allegheny County Health Department
Air Quality Program
301 39th Street
Pittsburgh, PA 15201-1891

Attn: Helen O. Gurvich
Air Quality Engineer

Subject: AKJ Clairton L.L.C.
Draft Minor Source Operating Permit
ACHD Permit No. 0637
[Project No. 40394-0000]

Dear Ms. Gurvich:

We have reviewed the Draft Air Quality Operating Permit and technical support documents submitted to us via your 11/17/06 email. The draft permit is consistent with our existing installation permit and with the application for an operating permit we submitted last year.

Our only requested change in the Operating Permit is a request to reduce the frequency of required analyses of the diluted sludge mixture for benzene concentration. Although condition V.A.2.b of our installation permit required sampling and analysis for benzene concentration on a quarterly basis, the Department had agreed in response to one of our comments on the original installation permit (Permit No. 0637-I-001) to "consider a future revision to the permit" in the event that there is little variation of the benzene content and if the benzene content does not approach the 1% by weight restriction. For several years now the measured benzene concentration has been well below the 1% cap. We therefore request that the frequency of benzene sampling/analyses be reduced to every six months, rather than every three months.

We appreciate your response to the above request. If you agree to adjusting the frequency, this will affect Sections V.A.2 and V.A.3.b of the Draft Permit.

1500 North State Street
Clairton, PA 15025
412-233-7222
Fax 412-233-6931

With the exception of the one request noted above, we have no further comments on the draft permit. We look forward to receiving the final Minor Source Operating Permit.

Sincerely,

A handwritten signature in black ink, reading "John Bielich". The signature is written in a cursive style with a large initial "J" and a stylized "B".

John Bielich
Vice President – Steel Operations

CC: Joe Duckett – SLAI